

4. Defendants operated a restaurant and meal delivery business at 133-35 Roosevelt Ave., Room 26, Flushing, NY 11354.

5. I was employed as a meal shopper for Defendants.

6. My primary work duties were purchasing meals and drinks to fulfill customers' orders.

7. JIANG hired me to work for GJ GROUP. JIANG is the owner of GJ GROUP and was my manager and oversaw my day-to-day work. JIANG determined when, whether, and how much to pay me. JIANG terminated my employment on May 30, 2018.

8. Defendants never provided me with a written time of hire notice in English or Mandarin Chinese (my primary language) reflecting my true rates of pay and payday.

9. While working for Defendants, I regularly worked 5 days per week.

10. I worked 14 hours per day each workday.

11. I worked at least 70 hours per week, but Defendants never paid me any overtime wages.

12. I was paid a base salary of \$120.00 per day in cash, regardless of my actual hours worked.

13. I worked my normal hours for Defendants from March 19, 2018 through April 15, 2018, but I was never paid any amount for that time.

14. Defendants never provided me with paystubs that listed my name, the employer's name, the employer's address and telephone number, my rate or rates of pay, any deductions

made from my wages, any allowances claimed as part of the minimum wage, and my gross and net wages for each pay day.

15. I worked over 10 hours per day almost every workday, but Defendants never paid me any spread-of-hours pay.

16. A true and accurate copy of a spreadsheet calculating my damages is annexed hereto as **Exhibit A**.

17. I have summarized the amounts of my damages as follows:

Category	Amount	Reference
Unpaid wages	\$4,800	Exhibit A, Table 1
Unpaid overtime wages	\$52,650	Exhibit A, Table 2
Unpaid spread of hours pay	\$2,243	Exhibit A, Table 3
Failure to provide time of hire notice	\$5,000	
Failure to provide pay stubs	\$5,000	
Total	\$69,693	

18. Defendants have never paid me any of the amounts summarized above or in Exhibit A.

19. I respectfully request that the Court enter judgment in my favor for a total of \$69,693.00 plus post-judgment interest.

20. I also make this declaration for attorney's fees. I retained the Harrison Law Firm on February 21, 2019. My attorney's declaration is attached.

WHEREFORE, I respectfully request that my application be granted in its entirety, along with such other and further relief as this Court deems just and proper.

Dated: Nov. 21
~~October~~, 2019
Worcester, Massachusetts

/s/ Yang Shen
Yang Shen

DECLARATION OF YANG SHEN

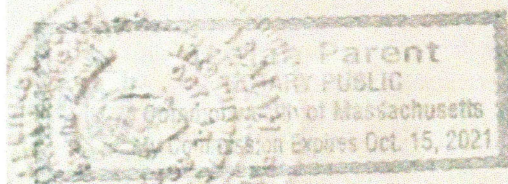
I, Yang Shen, certify that I fully understand and swear to as true the contents of the document entitled Declaration of Yang Shen.

Dated: Nov. 21 ~~October~~, 2019
Worcester, Massachusetts

/s/ Yang Shen
Yang Shen

Sworn to before me this 21 day of Nov. ~~October~~, 2019.

[Signature]
Notary Public



On this 21 day of Nov., 2019
before me, the undersigned notary public, personally appeared
YANG SHEN
and proved to me through satisfactory evidence of identification
which were PASSPORT
to be the person whose name is signed on the proceeding or
Attached document, in my presence.

AFFIRMATION OF TRANSLATION

I, Baya W. Harrison, certify that I am fluent in both Mandarin Chinese and English and that I have correctly and accurately translated this document from English to Mandarin Chinese and that the Plaintiff, Yang Shen, has assured me that he understands this document.

Dated: Nov. 21 ~~October~~, 2019
Flushing, New York

/s/ Baya Harrison
Baya Harrison

Exhibit A: Calculation of Yang Shen's Damages

Table 1. Unpaid Wages		
a	Unpaid Wages Start Date	March 19, 2018
b	Unpaid Wages End Date	April 15, 2018
c	Hours per day	14
d	Days per week	5
e	Wages per day	\$120
f = b - a (workdays only)	Unpaid work days	20
g = f * e	Subtotal of unpaid wages	\$2,400
h = g	FLSA & NYLL statutory penalty	\$2,400
i = g + h	Total unpaid wages	\$4,800

Table 2. Unpaid Overtime Wages		
a	Employment Start Date	September 1, 2017
b	Employment Termination Date	May 30, 2018
c	Hours per day	14
d	Days per week	5
e	Wages per day	\$120
f = c * d	Hours per week	70
g = f - 40	Overtime hours per week	30
h = b - a	Total weeks	39

$i = h * g$	Total overtime hours	1,170
$j = e/8$	Hourly wage	\$15
k	Overtime rate of pay	1.5
$l = j * k$	Overtime wage per overtime hour	\$22.50
$m = l * i$	Overtime subtotal	\$26,325
$n = m$	FLSA & NYLL statutory penalty	\$26,325
$o = m + n$	Total unpaid overtime wages	\$52,650

Table 3. Unpaid Spread of Hours Pay		
a	Employment Start Date	September 1, 2017
b	Employment Termination Date	May 30, 2018
c	Hours per day	14
d	Days per week	5
$e = b - a$ (workdays only)	Total spread of hours days	195
f	Spread of hours days before 12/31/2017	81
g	Spread of hours days after 12/31/2017	104
h	Minimum wage after 12/31/16	\$11.00
i	Minimum wage after 12/31/17	\$13.00
$j = h * f$	Spread of hours pay before 12/31/2017	\$891.00
$k = i * g$	Spread of hours pay after 12/31/2017	\$1,352.00
$l = j + k$	Total unpaid spread of hours pay	\$2,243.00